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UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

FILED JUL 09 2003  
at 10 o'clock and min. M.  
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, ) CR. NO. \_\_\_\_\_  
)  
Plaintiff, )  
)  
vs. ) INDICTMENT  
)  
) 18 U.S.C. §§ 371, 1344, 1029  
JENNIFER LA PUTT (01), ) and 1028  
FREDERICK BORJA (02), ) [Conspiracy, Bank Fraud,  
) Access Device Fraud, and  
Defendants. ) Identification Document  
) Fraud]  
)

CR03-00348

HG

INDICTMENT

COUNT 1

The Grand Jury charges:

From a precise earlier date unknown to the grand jury,  
but by February 21, 2003, and continuing through on or about  
July 3, 2003, in the District of Hawaii and elsewhere, JENNIFER

LA PUTT and FREDERICK BORJA did knowingly conspire with each other, to commit offenses against the United States, namely, bank fraud, access device fraud, and identification document fraud, violations of Title 18, United States Code, sections 1344, 1029 and 1028.

#### WAYS AND MEANS OF THE CONSPIRACY

JENNIFER LA PUTT and FREDERICK BORJA obtained the names and personal information of other individuals. LA PUTT and BORJA then manufactured false identification documents in those persons' names. LA PUTT and BORJA printed counterfeit checks, which they cashed using the false identification documents. LA PUTT and BORJA also used the false identification documents to make charges on credit cards issued in other persons' names. LA PUTT rented mail boxes under her assumed identities, and used these addresses to further and conceal the activities charged in this conspiracy.

#### OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, JENNIFER LA PUTT and FREDERICK BORJA committed various overt acts, including, but not limited to, the following:

1. On or about February 21, 2003, JENNIFER LA PUTT rented a box at The Mail Box, 1750 Kalakaua Avenue, #103-633, Honolulu, Hawaii, in the name of Kristi S.

2. On or about February 26, 2003, JENNIFER LA PUTT opened a checking account at American Savings Bank in the name of Kristi S.

3. On or about February 28, 2003, JENNIFER LA PUTT went to the Foodland Market City branch of American Savings Bank.

4. On or about February 28, 2003, at the Foodland Market City branch of American Savings Bank, JENNIFER LA PUTT gave a teller a Hawaii driver's license in the name of Kristi S., which bore LA PUTT's picture.

5. On or about March 20, 2003, JENNIFER LA PUTT and FREDERICK BORJA went to the Eurosport store in Honolulu.

6. On or about April 18, 2003, JENNIFER LA PUTT and FREDERICK BORJA went to Akamai Auto Sales in Honolulu.

7. On or about April 18, 2003, JENNIFER LA PUTT presented to Akamai Auto Sales a Hawaii drivers license bearing the name of Diane M., but LA PUTT's picture.

8. On or about May 13, 2003, JENNIFER LA PUTT opened a mail box at Mail Boxes Etc., 758 Kapahulu Avenue, #150, Honolulu, Hawaii under the name of Michelle C.

9. On or about May 13, 2003, JENNIFER LA PUTT showed employees of Mail Boxes Etc. a Hawaii drivers license in the name of Michelle C. but bearing LA PUTT's picture, and a Macy's credit card in Michelle C's name.

10. On or about May 23, 2003, FREDERICK BORJA went to the Kapiolani Kona Iki branch of American Savings Bank.

11. On or about May 30, 2003, JENNIFER LA PUTT went to the Kaimuki branch of American Savings Bank.

12. On or about July 3, 2003, JENNIFER LA PUTT possessed false identification documents bearing other persons' names, but her picture.

13. On or about July 3, 2003, FREDERICK BORJA possessed false identification documents bearing other persons' names, but his picture.

14. On or about July 3, 2003, JENNIFER LA PUTT and FREDERICK BORJA possessed counterfeit checks.

15. On or about July 3, 2003, JENNIFER LA PUTT and FREDERICK BORJA possessed computer equipment.

16. On or about July 3, 2003, JENNIFER LA PUTT and FREDERICK BORJA possessed blank check stock.

All in violation of Title 18, United States Code, section 371.

COUNTS 2-12

The Grand Jury further charges:

1. Beginning on or about April 6, 2003, and continuing through on or about June 6, 2003, in the District of Hawaii, JENNIFER LA PUTT and FREDERICK BORJA, did knowingly execute, and attempt to execute, a scheme and artifice to defraud American

Savings Bank, a federally chartered and insured financial institution, and to obtain money, funds and credits owned by and under the custody and control of American Savings Bank, by means of false and fraudulent pretenses and representations, all as more fully set forth below.

2. LA PUTT and BORJA would obtain the account numbers of persons and entities which had checking accounts at American Savings Bank. LA PUTT and BORJA then printed counterfeit checks drawn on those accounts, and presented the checks for payment at various American Savings Bank branches. LA PUTT and BORJA often presented false identification documents to American Savings Bank, and thereby made it appear as if the checks were legitimate and made payable to themselves, whereas they were actually counterfeit checks which were not authorized by the true account holders.

3. On or about the dates set forth below, in the District of Hawaii, JENNIFER LA PUTT and FREDERICK BORJA did knowingly execute, and attempt to execute, the aforesaid scheme and artifice to defraud American Savings Bank by presenting the following counterfeit checks, with each such presentment constituting a separate count of this indictment:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>	<u>PAYEE</u>
2	4/21/03	Check for \$1,000 drawn on account of Greg P.	Frederick Borja
3	5/23/03	Check for \$600 drawn on account of Tina K.	Singthong S.
4	5/23/03	Check for \$600 drawn on account of Tina K.	Singthong S.
5	5/24/03	Check for \$500 drawn on account of Tina K.	Singthong S.
6	5/24/03	Check for \$500 drawn on account of Tina K.	Singthong S.
7	5/27/03	Check for \$500 drawn on account of Tina K.	Singthong S.
8	5/27/03	Check for \$952.60 drawn on account of Tina K.	Singthong S.
9	5/30/03	Check for \$2,000 drawn on account of Pagoda Hotel	Michelle C.
10	5/30/03	Check for \$2,000 drawn on account of Pagoda Hotel	Michelle C.
11	6/1/03	Check for \$1,320.30 drawn on account of Pagoda Hotel	Singthong S.
12	6/2/03	Check for \$1,000 drawn on account of Pagoda Hotel	Singthong S.

All in violation of Title 18, United States Code,  
Section 1344.

COUNT 13

The Grand Jury further charges:

From on or about March 18, 2003 through on or about March 31, 2003, in the District of Hawaii and elsewhere, JENNIFER LA PUTT and FREDERICK BORJA did knowingly, and with intent to defraud, use an unauthorized access device, namely, a Chase MasterCard account issued in the names of Kristi and Roger S., to obtain goods and services having a value of more than \$1,000, thereby having an effect on interstate commerce.

In violation of Title 18, United States Code, sections 1029(a)(2) and 2.

COUNT 14

The Grand Jury further charges:

On or about April 18, 2003, at Akamai Auto Sales, in the District of Hawaii, JENNIFER LA PUTT did knowingly, and with intent to defraud, use an unauthorized access device, namely, a convenience check bearing the account number of a Bank One credit card issued to Diane M., to obtain goods and services having a value of more than \$1,000, thereby having an effect on interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT 15

The Grand Jury further charges:

On or about July 3, 2003, in the District of Hawaii, JENNIFER LA PUTT did knowingly possess, with intent to use unlawfully, in and affecting interstate commerce, five or more false identification documents, namely, counterfeited Hawaii and California drivers licenses which contained the names and personal identifiers of other persons, but LA PUTT's picture.

In violation of Title 18, United States Code, section 1028(a)(3).

COUNT 16

The Grand Jury further charges:

On or about July 3, 2003, in the District of Hawaii, FREDERICK BORJA did knowingly possess, with intent to use unlawfully, in and affecting interstate commerce, five or more false identification documents, namely, counterfeited Hawaii and California drivers licenses which contained the names and personal identifiers of other persons, but BORJA's picture.

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In violation of Title 18, United States Code, section  
1028(a)(3).

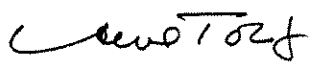
DATED: July 9, 2003, at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, Grand Jury

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United States v. Jennifer La Putt, et al.  
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